

RAAB, STURM & GANCHROW, LLP

COUNSELORS AT LAW
1250 BROADWAY 36TH FLOOR
NEW YORK, NEW YORK 10001
(212)683-6699
FAX (212)779-8596

RONALD RAAB
IRA A. STURM***
ARI D. GANCHROW*

MAURA E. BREEN**
MICHAEL GEFFNER
JONAH BRASSARD

*ADMITTED IN NY AND NJ
**ADMITTED IN NY AND CT
***ADMITTED IN NY AND FLA

February 11, 2016

The Honorable Andrew J. Peck
United States Magistrate Judge for the
Southern District of New York
500 Pearl Street
New York New York 10007

Re: Navarro & Dahi v. Bruckner Forever Young Social Adult Day Care Inc, et al.;
Docket No. 15-CV-00064 (AJP)

Dear Judge Peck,

The undersigned represents the Defendants in connection with the settlement reached in the above captioned matter. Due to technical difficulties, Defendants respectfully request that the deadlines for the initial payment be amended to be March 1, 2016 and that the dates for submission of the final list of employees also be adjourned to March 1, 2016. I have spoken to counsel for Plaintiffs and counsel suggested that I make this letter motion to allow for the additional time.

With regard to the payment, Defendants had thought that they could raise the initial payment (\$300,000.00) by now, but have advised me that it will take them some additional time. I have been assured by my client that such will be available by March 1, 2016. I have advised counsel for Plaintiffs of this difficulty.

With regard the list, Defendants generated a list of the class members which did not have termination dates for a number of individuals. I had asked my client to send in a corrected list but I have not received it. Accordingly, Defendants request that the date be put off to March 1, 2016. My client has now assured me that the information will be corrected.

Respectfully submitted,


Ira A. Sturm

cc: Borelli & Associates, P.L.L.C. (By email)